

ATTACHMENT 11



Transcript of **TERESE SWATT**

Date: September 24, 2013

Case: MARSTELLER v. ECS FEDERAL, INC., ET AL

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DEPOSITION OF TERESE SWATT
CONDUCTED ON TUESDAY, SEPTEMBER 24, 2013

31

1 items were as part of the plan to capture the U.S.
2 Postal Service work?

3 A There are a number of things that I can't
4 recall off the top of my head that are required that
5 are a part of a capture plan. I don't remember
6 exactly what those are, what those were.

7 Q Okay. So you don't recall who was doing
8 what as part of this plan, correct?

9 A I don't -- I don't recall specifically who
10 was doing what, no.

11 Q Okay. Do you recall what items
12 Ms. Marsteller was handling as part of pursuing the
13 capture of the United States Postal Service work?

14 A I know she had -- she had conversations with
15 potential teaming partners such as HP, and I think
16 we -- she already had the relationship with Tech
17 Systems, which was part of our -- which was part of
18 the strategy.

19 I think the Harris conversation just evolved
20 from both our sides because we were both talking to
21 people from -- the folks from Harris. She was talking
22 with -- she periodically would talk to Dan Garrison.

DEPOSITION OF TERESE SWATT
CONDUCTED ON TUESDAY, SEPTEMBER 24, 2013

32

1 I periodically would talk to a guy named Monty
2 Montgomery. I think Jackie also talked with David
3 Trask who eventually got involved.

4 Q And Mr. Trask, Mr. Montgomery, and
5 Mr. Garrison, they're all Harris employees?

6 A At the time, they were.

7 Q At the time that the strategy was being put
8 together, the capture of the USPS work, Mr. Trask,
9 Mr. Garrison, and Mr. Montgomery were all Harris
10 employees?

11 A That is correct, yes.

12 Q Okay. Do you recall anything else that was
13 being done as part of the strategy for the capture of
14 the USPS work?

15 A I know we would have -- I know Jackie set up
16 daily -- not daily, but we had status meetings. I
17 think initially -- I don't recall the frequency, but I
18 know we had some regular -- regularly scheduled
19 meetings that -- that Jackie ran that she was the
20 leader of.

21 Q And was the purpose of those meetings to
22 keep the capture strategy on target?

DEPOSITION OF TERESE SWATT
CONDUCTED ON TUESDAY, SEPTEMBER 24, 2013

33

1 A Yes, correct.

2 Q Now, do you know -- do you recall J4 being
3 involved in the capture strategy?

4 A I do, yes.

5 Q Do you know whether it was Ms. Marsteller
6 who brought in J4?

7 A Well, J4 came in -- came to us. We won a
8 contract at the USPS OIG, and after we won that
9 contract, it was -- there was some sort of
10 announcement that was posted someplace, and J4
11 actually reached out to us and said, hey, we're a
12 bunch of retired postal guys, we've got this
13 consulting firm if you ever need us.

14 So I believe it was Jackie who said, hey,
15 let's reach out to these guys and see what they can
16 bring to the table. Now, I don't remember if she
17 reached out to them or I reached out to them, but we
18 reached out to them to see what they could do to help
19 us, and I remember that we did meet with them.

20 Q How frequently were you in contact with J4
21 during the time ECS was putting together the plan for
22 the capture of the USPS work?

DEPOSITION OF TERESE SWATT
CONDUCTED ON TUESDAY, SEPTEMBER 24, 2013

34

1 A I think initially before the RFP dropped --
2 again, Jackie had set up those status calls, so I
3 think J4 -- I think they were invited to participate.
4 Now, whether they participated every time or not, I
5 don't know. And then once the RFP came out, they --
6 we were involved -- they provided us with more
7 information.

8 Q All right. And do you know what services
9 specifically J4 or what content J4 might have
10 contributed with respect to the capture plan that was
11 put together for the USPS work?

12 A I'm sorry. Can you just repeat that?

13 Q Do you know what content J4 might have
14 provided with respect to the capture plan or the
15 strategy that was put together?

16 A Well, what J4 had -- J4 had on their team
17 this person, Wayne Orbke, who used to be sort of the
18 deputy facility manager at the NCSC. And so Wayne was
19 able to provide us with what the organization looked
20 like. I think he provided us with an organizational
21 chart. He provided us with sort of a breakdown of the
22 functions within that organization. He was able to

DEPOSITION OF TERESE SWATT
CONDUCTED ON TUESDAY, SEPTEMBER 24, 2013

35

1 provide us generally with the number of staff of both
2 the postal staff and the contract staff.

3 So more than anything, he kind of helped us
4 with our organizational -- figuring out how our
5 organizational structure should look like. And then
6 the other thing that J4 was very involved with was
7 reviewing our document, participating in our red team
8 review.

9 Q And when you say the document, would that be
10 the proposal?

11 A The proposal, correct, yes.

12 Q Now, who was on the -- who was on the
13 proposal team? Am I not using the right word? Do you
14 know who at ECS was involved in the capture effort?

15 A In the capture effort? Well, Jackie had the
16 lead. Since she was the division manager, it fell
17 under her. The way I look at it, she had -- she was
18 the lead. I was a writer. Of course, Jackie wrote
19 part of it. I'm trying to remember who else wrote.
20 Darn. I'm sure other people wrote.

21 I think Jeff -- Jeff was always very good
22 at -- I think Jeff edited, provided edits. June